

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

- against -

TELEGRAM GROUP INC. and TON ISSUER  
INC.,

Defendants.

19 Civ. 9439 (PKC)

ECF Case

Electronically Filed

**NOTICE OF MOTION OF NON-PARTY JOHN HYMAN  
TO SEAL EXCERPTS OF DEPOSITION TRANSCRIPT**

PLEASE TAKE NOTICE that non-party John Hyman, on (1) the accompanying memorandum of law and (2) supporting affidavit, by and through his attorneys Quinn Emanuel Urquhart & Sullivan, LLP, hereby moves this Court before the Honorable P. Kevin Castel, at the United States Courthouse, Courtroom 11D, 500 Pearl Street, New York, New York 10007, at such time as the Court may designate, for an order sealing limited portions of the transcript of his deposition taken on February 4, 2020 in the above-captioned case, which are contained in Exhibit A to the Letter from the Securities and Exchange Commission filed with the Court on February 10, 2020 (EFC Docket No. 180), for the reasons specified in the memorandum of law accompanying the instant Notice of Motion.

Dated: February 17, 2020

Respectfully submitted,

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

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